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10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 CATHERINE FERRARO,)
13 Plaintiff,) CASE NO.
14 v.) 2:23-cv-00575-ART-BNW
15 KILOLO KIJAKAZI, ACTING) **SECOND UNOPPOSED MOTION**
16 COMMISSIONER OF SOCIAL SECURITY,) **FOR EXTENSION OF TIME TO FILE**
17 Defendant.) **PLAINTIFF'S BRIEF**

18 Plaintiff, Catherine Ferraro by her attorney, moves for an additional thirty (30) day
19 extension of time to file Plaintiff's opening brief by October 12, 2023. Plaintiff's opening brief is
20 currently due to be filed September 15, 2023. This is Plaintiff's second request for an extension
21 in this matter. On July 14, 2023, this court granted Plaintiff's first motion for an extension of
22 time (Dkt. No. 11).

23 Counsel requests this extension due to two briefing attorneys leaving Counsel's office
24 within the last few weeks. This has necessitated a complete reorganization and reassignment of
25 the attorney's schedules. Further, Counsel has explored the possibility of reassignment, but is
26 unable to do so due to multiple, simultaneous filing deadlines. Counsel requires additional time
27 to properly and thoroughly prepare Plaintiff's brief. These circumstances do not allow for
28 Plaintiff's Counsel to properly prepare the brief by the current deadline. This request will not

1 cause Defendant any undue hardship. This extension is needed to thoroughly and properly
2 prepare the brief by the current deadline.

3 Wherefore, Plaintiff requests an extension from September 15, 2023, up to and including
4 October 12, 2023 to file her brief. Counsel for the Plaintiff has conferred with Defendant's
5 Counsel who has no objection to this request.

6
7 Dated September 10, 2023

8
9 Respectfully submitted,

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12 /s/Hal Taylor
13 Hal Taylor, Esq.

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16 **Plaintiff's Certificate of Service:**

17 I certify that I caused the Second Unopposed Motion for Extension of Time to be served
18 today, September 10, 2023, by CMECF to Blaine T. Welsh, Esq., and Oscar Gonzalez, Esq., who
19 are filing users of the CM/ECF system.

20
21
22 /s/Hal Taylor
23 Hal Taylor

24 Good cause being found, Plaintiff's second motion to extend time is GRANTED. The opening
25 brief shall be filed no later than October 12, 2023.

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28 **IT IS SO ORDERED**

DATED: 3:54 pm, September 12, 2023


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